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Attorneys for Defendant
Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN
SUPPORT OF DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION FOR
RELIEF FROM NONDISPOSITIVE
PRETRIAL ORDER RE: WAYMO'S
MOTION TO COMPEL OF MAGISTRATE
JUDGE (DKT. 881)**

Courtroom: 8, 19th Floor
Judge: Honorable William Alsup
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Documents Under Seal;
2. [Proposed] Order;
3. Redacted/Unredacted Version of Motion for
Relief;
4. Proof of Service

1 I, Hong-An Vu, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for
3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
6 Trucking’s Administrative Motion to File Under Seal Portions of its Motion for Relief from
7 Nondispositive Pretrial Order re Waymo’s Motion to Compel of Magistrate Judge (Dkt. 881) (the
8 “Objection”).

9 2. I have reviewed the following documents and confirmed that only the portions
10 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Objection	Highlighted Portions

11
12
13
14 3. The highlighted portions of the Objection contain highly confidential, sensitive
15 business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate
16 structure, and financial information. This highly confidential information is not publicly known,
17 and its confidentiality is strictly maintained. I understand that if this information were made
18 public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking
19 structures its business agreements, allowing them to modify their own business strategy. Otto
20 Trucking’s competitive standing could be significantly harmed.

21 4. Otto Trucking’s request to seal is narrowly tailored to those portions of the
22 motion’s supporting documents that merit sealing.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is
24 true and correct. Executed this 17th day of July, 2017 in San Francisco, California.

25
26 /s/ Hong-An Vu
Hong-An Vu